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January 24, 2012

VIA FACSIMILE AND FIRST CLASS MAIL

The Honorable Michael A. Shipp Martin Luther King, Jr. Federal Building & U.S. Courthouse 50 Walnut Street Newark, NJ 07101 F: (973) 645-4412

Re:

Sally White v. Smiths Detection, Inc. et al,

No. 2:10-cv-04078-SRC-MAS

Dear Judge Shipp:

Per the Court's Order dated January 9, 2012, Plaintiff Sally White has until today, January 24, 2012 to file her informal motion to compel as to any discovery disputes that the parties could not resolve. The parties are currently still in the meet and confer process regarding several disputes and expect to continue their discussions this week. Accordingly, we write to request an extension of time until January 30, 2012 for Plaintiff to file this motion, with a corresponding extension of time for Defendants to respond until February 6, 2012, and an adjournment of the status conference with the Court currently scheduled for February 3, 2012 until February 10, 2012 or at Your Honor's convenience.

Respectfully Submitted,

W. John Lee

WJL / tmm

c: Ellen O'Connell, Esquire (via email)

Jyotin Hamid, Esquire (via email)

Sarah E. Bouchard, Esquire (via email)